

RICHARD G. CAMPBELL, JR.
Nevada Bar No. 1832
KAEMPFER CROWELL
50 West Liberty Street, Suite 700
Reno, Nevada 89501
Telephone: (775) 852-3900
Fax: (775) 327-2011
Email: rcampbell@kcnvlaw.com

JOHN R. NEVE (*Pro Hac Vice*)
Minnesota Bar No. 273800
JOHN HAYDEN (*Pro Hac Vice*)
Minnesota Bar No. 504136
QUANTUM LEX PA
6800 France Avenue South, Suite 405
Minneapolis, MN 55435
Telephone: (952) 746-2400
Fax: (952) 746-2401
Email: jneve@quantumlex.io
Email: jhayden@quantumlex.io

Attorneys for Defendant/Counterclaimant
SNAPS Holding Company

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THOMAS K. KURIAN, individually,)	CASE NO.:2:19-cv-01757-GMN-EJY
)	
Plaintiff/Counterdefendant,)	
)	
vs.)	
)	
SNAPS HOLDING COMPANY, a North)	
Dakota Domestic Corporation,)	
)	
Defendant/Counterclaimant.)	
)	

MOTION TO EXTEND DEADLINE TO FILE PLEADINGS IN SUPPORT OF
DEFENDANT'S ATTORNEYS FEES AND COSTS FOR SECOND MOTION FOR
ORDER TO SHOW CAUSE

1 Pursuant to LR IA 6-1(a), Defendant and Counterclaimant SNAPS Holding
2 Company (“SNAPS”) respectfully submits this Memorandum of Points and Authorities in
3 Support of its Motion to Extend Deadline to File Pleadings in Support of SNAP’s
4 Attorneys’ Fees and Costs for Second Motion for Order to Show Cause. SNAPS’ counsel
5 has conferred with Mr. Kurian’s counsel, and Mr. Kurian’s counsel has no objection to this
6 motion.
7

8 **POINTS AND AUTHORITIES**

9
10 On September 16, 2024, at the hearing on Plaintiff’s Second Motion for an Order to
11 Show Cause, the Court granted Plaintiff 14 days after the conclusion of the trial to file its
12 memorandum and declaration in support of attorneys' fees and costs. (ECF No. 166.) Trial
13 ended in this matter on September 27, 2024. (ECF No. 183.) By Plaintiff’s calculation, the
14 current deadline to submit these filings is October 11, 2024.
15

16 Following trial, Defendant’s counsel have been unexpectedly burdened with a
17 heavier-than-anticipated post-trial workload, including responsibilities arising from a
18 week-long, out-of-town trial. These post-trial demands have impeded counsel’s ability to
19 complete the supporting pleadings for its fees and costs by the original deadline.
20

21 As a result, Defendant’s respectfully requests a brief extension of the filing deadline
22 to Tuesday, October 15, 2024, as October 14, 2024, is a federal holiday (Columbus Day).
23
24
25
26
27
28

Respectfully submitted,

s/ John R. Neve

JOHN R. NEVE (*Pro Hac Vice*)

Minnesota Bar No. 273800

JOHN HAYDEN (*Pro Hac Vice*)

Minnesota Bar No. 504136

QUANTUM LEX PA

6800 France Avenue South, Suite 405

Minneapolis, MN 55435

Telephone: (952) 746-2400

Fax: (952) 746-2401

Email: jneve@quantumlex.io

RICHARD G. CAMPBELL, JR.

Nevada Bar No. 1832

KAEMPFER CROWELL

50 West Liberty Street, Suite 700

Reno, Nevada 89501

Telephone: (775) 852-3900

Fax: (775) 327-2011

Email: rcampbell@kcnvlaw.com

Attorneys For Defendant

SNAPS Holding Company

Dated: October 11, 2024

IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

Date: October 11, 2024